

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Civil Action No.: 06-409-GMS

M.A. HANNA PLASTICS GROUP, INC.;
WILMINGTON ECONOMIC
DEVELOPMENT CORPORATION; and
SIDNEY and CAROL MAFFETT,

Defendants.

**DEFENDANT, M.A. HANNA PLASTICS GROUP, INC.'S RESPONSES
TO PLAINTIFF, UNITED STATES OF AMERICA'S
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS**

Defendant, M.A. Hanna Plastics Group, Inc. ("Defendant" or "M.A. Hanna") responds to the United States of America's ("United States") Second Request for Production of Documents as follows:

GENERAL OBJECTIONS

M.A. Hanna submits the following answers and objections to the Second Request for Production of Documents dated November 20, 2007, propounded by United States. As a general response, M.A. Hanna objects to each request to the extent that each seeks matters not discoverable under the Attorney-client Privilege or the Work-Product Doctrine. M.A. Hanna reserves the right to object to future discovery on the within matters (or related matters) and does not waive its objections by providing the information included in these responses and producing documents for discovery and inspection. M.A. Hanna further reserves the right to object to the

admissibility of any of the responses made herein and documents produced (or issues relating to them) in whole or in part, at trial in this action on any grounds, including, but not limited to, materiality, relevance, and privilege. M.A. Hanna reserves the right to supplement its responses.

RESPONSES TO SECOND REQUEST FOR PRODUCTION OF DOCUMENTS

1. Provide a copy of each and every document upon which you rely in making each and every denial in your responses to both the United States' First Request for Admissions and the United States' Second Request for Admissions.

RESPONSE:

M.A. Hanna objects to this request. M.A. Hanna is responding to all discovery on its own behalf only, not on behalf of any of the other named entities listed in the United States' First Request for Admissions and the United States' Second Request for Admissions. M.A. Hanna objects to the term "the companies" as including M.A. Hanna itself, Chicago Electric Hose Company, Electric Hose & Rubber, Delday, Inc., Dayco Corporation, Day International Corporation and Cadillac Plastic Group, Inc. M.A. Hanna objects to this request to the extent it seeks information from any entity other than M.A. Hanna itself.

M.A. Hanna objects to this request on the grounds that it is vague and ambiguous, overbroad and burdensome. M.A. Hanna objects to this request to the extent that it seeks documents protected from disclosure by the attorney-client and work product privileges. Subject to, and without waiving said objections, see documents previously produced by M.A. Hanna in this litigation, including documents produced in response to WEDCO's First Demand for Production of Documents. M.A. Hanna reserves the right to supplement and amend its response to this Request.

2. Provide a copy of all documents identified, referred to or relied upon in responding to each and every Interrogatory in the United States' Second and Third Sets of Interrogatories Propounded Upon M.A. Hanna Plastics Group, Inc.

RESPONSE:

M.A. Hanna objects to this request. M.A. Hanna is responding to all discovery on its own behalf only, not on behalf of any of the other named entities listed in the United States' First Request for Admissions and the United States' Second Request for Admissions. M.A. Hanna objects to the term "the companies" as including M.A. Hanna itself, Chicago Electric Hose Company, Electric Hose & Rubber, Delday, Inc., Dayco Corporation, Day International Corporation and Cadillac Plastic Group, Inc. M.A. Hanna objects to this request to the extent it seeks information from any entity other than M.A. Hanna itself.

M.A. Hanna objects to this request on the grounds that it is vague and ambiguous, overbroad and burdensome. M.A. Hanna objects to this request to the extent that it seeks documents protected from disclosure by the attorney-client and work product privileges. Subject to, and without waiving said objections, see documents previously produced by M.A. Hanna in this litigation, including documents produced in response to WEDCO's First Demand for Production of Documents. M.A. Hanna reserves the right to supplement and amend its response to this Request.

Dated: January 28, 2008

By: /s/ John A. Macconi, Jr.
JOHN A. MACCONI, JR., ESQUIRE
MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN
1220 North Market Street, 5th Floor
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302-552-4300

On behalf of Defendant,
M.A. Hanna Plastics Group, Inc.

OF COUNSEL:

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856-414-6000

On behalf of Defendant,
M.A. Hanna Plastics Group, Inc.

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FOR THE DISTRICT OF DELAWARE

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Plaintiff

v.

M.A. HANNA PLASTICS GROUP, INC.,
WILMINGTON ECONOMIC DEVELOPMENT
CORPORATION AND SIDNEY and CAROL
MAFFETT,

Defendants

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: CIVIL ACTION
: NO. 06-409-GMS
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NOTICE OF SERVICE

PLEASE TAKE NOTICE that on January 28, 2008, a true and correct copy of
*Defendant, M.A. Hanna Plastics Group, Inc.'s Responses to Plaintiff, United States of
America's Second Request for Production of Documents* were served on counsel as
identified below:

VIA E-FILE

Patricia C. Hannigan, Esquire
U.S. Attorney's Office
The Nemours Building
1007 Orange Street, Suite 700
Wilmington, Delaware 19899-2046

VIA E-FILE

Robert W. Whetzel, Esquire
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920 North King Street
Wilmington, Delaware 19801

By: /s/ John A. Macconi, Jr. DE ID No. 4430
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On behalf of Defendant,
M.A. Hanna Plastics Group, Inc.

OF COUNSEL:

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MARSHALL, DENNEHEY, WARNER,
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On behalf of Defendant,
M.A. Hanna Plastics Group, Inc.